

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION,

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

Debtors.

9
10 ☐ Affects PG&E Corporation

11 ☐ Affects Pacific Gas and Electric Company

12 ☒ Affects both Debtors

13 ** All papers shall be filed in the Lead Case,*
14 *No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**FOURTH INTERIM AND FINAL
APPLICATION OF TRIDENT DMG
LLC FOR ALLOWANCE AND
PAYMENT OF COMPENSATION
AND REIMBURSEMENT OF
EXPENSES FOR (1) THE INTERIM
PERIOD FROM JUNE 1, 2020
THROUGH JUNE 30, 2020 AND (2)
THE FINAL PERIOD FROM
JULY 18, 2019 THROUGH JUNE 30,
2020**

[No hearing requested]

DATE: TBD
TIME: TBD

OBJECTION DATE:
September 16, 2020 at 4:00 p.m. (PDT)

1 **GENERAL INFORMATION**

2 NAME OF APPLICANT: TRIDENT DMG LLC

3 AUTHORIZED TO PROVIDE
4 PROFESSIONAL SERVICES TO: OFFICIAL COMMITTEE OF TORT
5 CLAIMANTS

6 PETITION DATE: JANUARY 29, 2019

7 RETENTION DATE: ORDER ENTERED SEPTEMBER
8 17, 2019, EFFECTIVE AS OF JULY
9 18, 2019

10 PRIOR APPLICATIONS: FIRST INTERIM APPLICATION
11 OF TRIDENT DMG LLC FOR
12 ALLOWANCE AND PAYMENT
13 OF COMPENSATION AND
14 REIMBURSEMENT OF EXPENSES
15 FOR THE PERIOD FROM JULY 18,
16 2019 THROUGH SEPTEMBER 30,
17 2019 [DKT. NO. 4721]

18 SECOND INTERIM APPLICATION
19 OF TRIDENT DMG LLC FOR
20 ALLOWANCE AND PAYMENT
21 OF COMPENSATION AND
22 REIMBURSEMENT OF EXPENSES
23 FOR THE PERIOD FROM
24 OCTOBER 1, 2019 THROUGH
25 JANUARY 30, 2020 [DKT. NO.
26 6297]

27 THIRD INTERIM APPLICATION
28 OF TRIDENT DMG LLC FOR
ALLOWANCE AND PAYMENT
OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM
FEBRUARY 1, 2020 THROUGH
MAY 31, 2020 [DKT. NO. 8395]

1 **SUMMARY OF FEES AND EXPENSES SOUGHT IN THE FOURTH INTERIM FEE**
2 **APPLICATION**

3
4 TIME PERIOD COVERED BY APPLICATION: JUNE 1, 2020 THROUGH JUNE 30, 2020

5 TOTAL FEES SOUGHT FOR THIS
6 PERIOD: \$35,000.00 (100%)

7 TOTAL EXPENSES SOUGHT FOR THIS PERIOD: \$0.00

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9 TOTAL FEES ALREADY PAID FOR
THIS PERIOD: \$14,000.00

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11 TOTAL EXPENSES ALREADY PAID FOR THIS
PERIOD: \$0.00

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13 TOTAL COMPENSATION SOUGHT IN THIS
APPLICATION AND NOT YET PAID: \$21,000.00

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15 **SUMMARY OF FEES AND EXPENSES SOUGHT IN THE FINAL FEE APPLICATION**

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17 TIME PERIOD COVERED BY APPLICATION: JULY 18, 2019 THROUGH JUNE 30, 2020

18 TOTAL FEES SOUGHT FOR THIS
19 PERIOD: \$412,500.00 (100%)

20 TOTAL EXPENSES SOUGHT FOR THIS PERIOD: \$28,846.15

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22 TOTAL FEES ALREADY PAID FOR
THIS PERIOD: \$334,421.33

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24 TOTAL EXPENSES ALREADY PAID FOR THIS
PERIOD: \$28,846.15

25
26 TOTAL COMPENSATION SOUGHT IN THIS
APPLICATION AND NOT YET PAID: \$77,578.67¹

27
28
¹ Adjusted by minus \$500.00 to reflect fee-reduction agreement noted in Footnote 2.

SUMMARY OF FOURTH INTERIM AND FINAL FEE APPLICATION

Date Filed	Period Covered	Fixed Fees Requested	Fees Paid	Expenses Requested	Expenses Paid	Unpaid Amounts
1 st Interim Fee Application 11/14/19 (DE 4721)	07/18/19-09/30/19	\$97,500.00	\$96,421.33 ²	\$12,037.01	\$12,037.01	\$578.67
2 nd Interim Fee Application 03/13/20 (DE 6297)	10/01/19-01/30/20	\$140,000.00	\$112,000.00	\$13,574.74	\$13,574.74	\$28,000.00
3 rd Interim Fee Application 07/14/20 (DE 8395)	02/01/20-05/31/20	\$140,000.00	\$112,000.00	\$3,234.40	\$3,234.40	\$28,000.00
11 th Monthly Statement (Portion for Uncovered Period)	06/01/20-06/17/20	17,500.00	\$14,000.00	\$0.00	N/A	\$3,500.00
12 th Monthly Statement 08/03/20 (DE 8621)	06/18/20-06/30/20	\$17,500.00	\$0.00	\$0.00	N/A	\$17,500.00
TOTAL		\$412,500.00	\$334,421.33	\$28,846.15	\$28,846.15	\$77,578.67³

Summary of Any Objections to Interim Fee Applications/Monthly Fee Statement: None

Compensation and Expenses Sought and Not Yet Paid: **\$77,578.67.**

² Trident and the Fee Examiner agreed to a reduction in fees in the amount of \$500.00.

³ Adjusted by minus \$500.00 to account for fee reduction noted in Footnote 1.

**HOURS BY PROFESSIONAL
FOR THE PERIOD JULY 18, 2019 THROUGH JUNE 30, 2020**

PROFESSIONAL	POSITION	TOTAL HOURS
Lanny Davis	Partner	35.50
Adam Goldberg	Partner	103.00
Alexander Lange	Senior Director	435.00
Eleanor McManus	Partner	43.00
Emily Seeley	Account Manager	318.50
TOTAL		935.00

**HOURS BY TASK FOR
FOR THE PERIOD JULY 18, 2019 THROUGH JUNE 30, 2020**

TASK DESCRIPTION	HOURS
Meetings, Telephone Calls, and Emails with Client and/or Client Attorneys	278.00
Internal Client Meetings	114.50
Research and Writing	116.50
Working with the Media	235.50
Travel	89.00
Communications with External Stakeholders	80.50
Attend Court Hearing	21.00
TOTAL	935.00

EXPENSE SUMMARY
FOR THE PERIOD JULY 18, 2019 THROUGH JUNE 30, 2020

EXPENSES	AMOUNTS
CourtCall to Attend Court Hearing	\$410.00
Media Release	\$3,146.90
Airfare/Train Fare	\$8,247.20
Lodging	\$1,992.50
Ground Transportation	\$1,748.53
Business Meals	\$375.06
Digital Advertising	\$12,417.40
Conference Calls	\$508.56
Total Expenses Requested:	\$28,846.15

1 **FOURTH INTERIM AND FINAL APPLICATION OF TRIDENT DMG LLC FOR**
2 **ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF**
3 **EXPENSES FOR THE PERIOD JULY 18, 2019 THROUGH JUNE 30, 2020**

4 Trident DMG LLC (“**Trident**” or the “**Applicant**”), the communications consultant for the
5 Official Committee of Tort Claimants (the “**TCC**”), representing the largest group of stakeholders
6 in the jointly administered bankruptcy cases (the “**Bankruptcy Cases**”) of PG&E Corporation and
7 Pacific Gas and Electric Company (the “**Debtors**” or “**Reorganized Debtors**”), hereby submits its
8 *Fourth Interim and Final Application of Trident DMG LLC for Allowance and Payment of*
9 *Compensation and Reimbursement of Expenses for (1) the Interim Period From June 1, 2020*
10 *through June 30, 2020* (the “**Interim Application Period**”) and (2) *the Final Period From July*
11 *18, 2019 through June 30, 2020* (the “**Final Application Period**” and, together with the Interim
12 Application Period, the “**Application Period**”) (the “**Application**”) seeking entry of an order, on
13 a final basis, pursuant to Sections 330(a) and 331 of Title 11, United States Code (the “**Bankruptcy**
14 **Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule
15 2016-1 of the Local Bankruptcy Rules for the Northern District of California (the “**Local Rules**”),
16 the *Guidelines for Compensation and Expense Reimbursement of Professional and Trustees*,
17 promulgated pursuant to Local Rule 9029-1, governing the narrative portion of fee applications,
18 effective February 19, 2014 (the “**Narrative Guidelines**”), the *U.S. Trustee Guidelines for*
19 *Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C.*
20 *§ 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013 (the “**UST**
21 **Guidelines**”), the *Order Pursuant to 11 U.S.C. §§ 331 and 105(a) and Fed. R. Bankr. P. 2016 For*
22 *Authority to Establish Procedures for Interim Compensation and Reimbursement of Expenses of*
23 *Professionals* (“**Interim Compensation Order**”) [Docket No. 701], and the revised Fee Examiner
24 Protocol filed on October 24, 2019 (the “**Revised Protocol**”) [Docket No. 4473] (collectively, the
25 “**Guidelines**”) for final allowance of compensation for professional services and reimbursement of
26 actual and necessary expenses in connection with the Applicant’s representation of the TCC in the
27 Bankruptcy Cases.

28 Trident seeks final approval of compensation and reimbursement of expenses for the Final
Application Period totaling **\$441,346.15** which sum represents fees for communications services

1 rendered in the amount of **\$412,500.00** and reimbursement for expenses incurred in the amount of
2 **\$28,846.15**.

3 This Application is based upon the contents hereof, together with the exhibits, the
4 declaration of Adam W. Goldberg filed concurrently herewith, the pleadings, papers, and records
5 on file in the Bankruptcy Cases, and any evidence or argument that the Court may entertain at the
6 time of any hearing on the Application.

7 Pursuant to the Guidelines, a cover letter enclosing this Application is being sent to the
8 Chair of the TCC concurrently. The letter invites the Chair to discuss with the Applicant and/or the
9 Office of the United States Trustee (“UST”) any objections, concerns, or questions the Chair may
10 have regarding the requested compensation and reimbursement set forth in the Application. A copy
11 of the transmittal letter is attached hereto as **Exhibit A**.

12 **RELEVANT BACKGROUND**

13 1. On January 29, 2019 (the “**Petition Date**”), the Debtors filed the Bankruptcy Cases.
14 The Debtors continued to operate their businesses and manage their properties as debtors-in-
15 possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code during the Final
16 Application Period. The Bankruptcy Cases are being jointly administered for procedural purposes
17 only pursuant to Bankruptcy Rule 1015(b).

18 2. On February 15, 2019, the Office of the UST filed an Appointment of the Official
19 Committee of Tort Claimants [Docket No. 453]. Following the resignation of Richard Heffern
20 from the original TCC and the addition of Tommy Wehe, on February 21, 2019, the UST filed the
21 Amended Appointment of the Official Committee of Tort Claimants [Docket No. 530]. Following
22 the resignation of Kirk Trostle and GER Hospitality, LLC, the UST filed the Second Amended
23 Appointment of the TCC on March 27, 2020 [Docket No. 6503]. On April 3, 2020, following the
24 resignation of Karen K. Gowins, the UST filed the Third Amended Appointment of the TCC
25 [Docket No. 6613]. The current members of the TCC are: (i) Tommy Wehe; (ii) Angelo Loo; (iii)
26 Agajanian, Inc.; (iv) Susan Slocum; (v) Samuel Maxwell; (vi) Karen M. Lockhart; (vii) Wagner
27 Family Wines-Caymus Vineyards; and (viii) Gregory Wilson.
28

1 3. On July 27, 2019, the TCC filed its *Application of the Official Committee of Tort*
2 *Claimants Pursuant to 11 U.S.C. §1103 and Fed. R. Bankr. P. 2014 and 5002 to Retain and Employ*
3 *Trident DMG LLC as Communications Consultant Effective as of July 18, 2019* [Docket No. 3224]
4 (the “**Retention Application**”). On September 17, 2019, the Court entered its *Order Approving*
5 *the Application of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. §1103 and Fed.*
6 *R. Bankr. P. 2014 and 5002 to Retain and Employ Trident DMG LLC as Communications*
7 *Consultant Effective as of July 18, 2019* [Docket No. 3916] (the “**Retention Order**”). A true and
8 correct copy of the Retention Order is attached hereto as **Exhibit B**. The Applicant is not holding,
9 and has not held, any retainer in connection with the Bankruptcy Cases or the work performed on
10 behalf of the TCC.

11 4. As set forth below, Trident worked with the TCC and its attorneys to address the
12 serious issues involved with communicating with the tort claimants in the Bankruptcy Cases during
13 the Application Period, including helping educate the tort claimants about the Bankruptcy Court’s
14 deadline for filing proofs of claim and the Debtors’ plan of reorganization. The services and
15 expenses for which final compensation is sought herein were rendered for and on behalf of the
16 TCC. Trident respectfully submits that the nature of the services has been necessary and beneficial
17 to the TCC in maximizing recoveries for tort claimants.

18 5. On May 28, 2019, the Court entered an order appointing Bruce A. Markell as fee
19 examiner (“**Fee Examiner**”) in the Bankruptcy Cases. [Docket No. 2267]. Trident has
20 communicated with the Fee Examiner and has supplied information to the Fee Examiner as
21 requested and necessary for the Fee Examiner to evaluate the reasonableness of the compensation
22 sought in this Application.

23 **RELIEF REQUESTED AND BASIS FOR RELIEF**

24 6. This Application is Trident’s fourth interim and final request for allowance and
25 payment of fees and expenses as communications consultant to the TCC.

26 7. Pursuant to Bankruptcy Code §§ 330 and 331, Trident respectfully requests entry of
27 an order, on a final basis, allowing and approving **\$441,346.15** which sum represents fees for
28 communications services rendered in the amount of **\$412,500.00** and reimbursement for expenses

1 incurred in the amount of **\$28,846.15**. Copies of Applicant's invoices detailing the services
2 rendered during the Application Period can be found on the Court's docket at Doc. Nos. 3995,
3 4522, 4440, 4890, 5309, 5491, 6043, 6577, 7016, 7690, 8128 and 8621.

4 8. Trident has made every effort to ensure that this Application complies with the
5 Guidelines and to avoid unnecessary duplication of effort by and among its partners and staff, as
6 well as with other retained professionals in these cases. Trident has supplied the Fee Examiner with
7 Trident's monthly fee statements.

8 **SUMMARY OF PROFESSIONAL SERVICES RENDERED**

9 9. Trident's partners and staff spent 905.50 hours performing the services described in
10 the Application, of which 9.5 hours was spent performing services during the Interim Application
11 Period. The Trident team who rendered professional services during the Final Application Period
12 are as follows: (1) Adam Goldberg (Partner); (2) Lanny Davis (Partner); (3) Eleanor McManus
13 (Partner); (4) Alexander Lange (Senior Director); and (5) Emily Seeley (Account Manager). Adam
14 Goldberg, Alexander Lange, and Emily Seeley rendered professional services during the Interim
15 Application Period.

16 **FIXED FEE BILLING AND NARRATIVE STATEMENT OF SERVICES RENDERED**

17 10. Pursuant to the Retention Order, Trident bills on a flat-fee basis. Trident focused its
18 efforts during this period on educating tort claimants and other stakeholders about developments in
19 the proceedings to help tort claimants understand fully how these developments may impact their
20 claims.

21 11. In addition to the requirement that a description of the general services rendered by
22 a professional be provided in a fee application, the Guidelines also require that applications for
23 compensation should:

24 "...categorize by subject matter and separately discuss, each project or task.

25 With respect to each project or task, the number of hours spent, the results
26 obtained, and the amount of compensation and expenses requested should be
27 set forth at the conclusion of the discussion of that project or task."
28

1 12. Trident established the following project categories for its representation of the
2 TCC: (1) Meetings, Telephone Calls, and Emails with Client and/or Client Attorneys; (2) Internal
3 Client Meetings; (3) Research and Writing; (4) Working with the Media; and (5) Attending Court
4 Hearings.

5 13. These project categories enabled Trident to monitor its activities and appropriately
6 account for its professionals' time and to better inform the TCC, the Court, the UST, and the Fee
7 Examiner regarding the nature of the services provided and time expended by its professionals and
8 paraprofessionals. The work in each of these categories generally consisted of the following tasks:

9 (a) Meetings, Telephone Calls, and Emails with Client and/or Client Attorneys

10 Essential to Trident's work was coordinating with the TCC and its outside counsel
11 about the status of the Bankruptcy Court's proceedings and about Trident's outreach efforts to the
12 media and public officials regarding issues important to communicate to tort claimants and other
13 stakeholders. Trident held weekly scheduled and ad hoc calls with both the TCC and its outside
14 counsel.

15 (b) Internal Client Meetings

16 The Trident team met regularly to coordinate our efforts on the TCC's behalf,
17 evaluate the effectiveness of Trident's efforts to date, monitor the status of Trident's efforts, and
18 plan Trident's next action items.

19 (c) Research and Writing

20 Trident's work required reviewing court records and other publicly available
21 information relating to the TCC's claims and assessing the effectiveness of Trident's efforts.
22 Trident's efforts also included written work to carry out assigned tasks and keep the TCC and its
23 outside counsel informed of Trident's efforts.

24 (d) Working with the Media

25 Trident spent a substantial portion of its time educating journalists about issues of
26 import to the tort claimants and other stakeholders. This included working with national, regional,
27 and local print, broadcast, and online journalists.
28

1 (e) Attending Court Hearings

2 Trident at times telephonically attended court hearings to ensure Trident fully
3 understood the legal developments and was sufficiently informed to advise the client and educate
4 the media and other stakeholders about those developments.

5 14. In compliance with the Guidelines, a description of the people employed by Trident
6 who rendered services to the TCC in the Bankruptcy Cases during the Application Period and
7 whose time entries appear in the invoices is included in **Exhibit C**, attached hereto.

8 15. Set forth below is a summary, by project category, of the services Trident rendered
9 during the Application Period. The number of hours devoted by each Trident professional to each
10 project category is detailed in the invoices that can be found at Doc. Nos. 3995, 4522, 4440, 4890,
11 5309, 5491, 6043, 6577, 7016, 7690, 8128 and 8621.

PROJECT CATEGORY	HOURS
Meetings, Telephone Calls, and Emails with Client and/or Client Attorneys	278.00
Internal Client Meetings	114.50
Research and Writing	116.50
Working with the Media	235.50
Attending Court Hearings	21.00
Travel	89.00
Communications with External Stakeholders	80.50
TOTAL	935.00

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25 16. Pursuant to Bankruptcy Code § 504, Trident has no understanding, agreement, or
26 arrangement of any kind to divide with or pay to anyone any fees that may be awarded to Trident
27 in the Bankruptcy Cases, other than as may be shared among the members of the Trident firm.
28

1 17. Costs and Expenses: Trident requests allowance and reimbursement of actual,
2 reasonable, and necessary out-of-pocket expenses in the amount of **\$3,234.40** incurred while
3 rendering professional services on behalf of the TCC during the Application Period.

4 18. The expenses Trident incurred during the Application Period are set forth in detail
5 on the invoices that may be found on the Court's docket at Doc. Nos. 3995, 4522, 4440, 4890,
6 5309, 5491, 6043, and 7016, and are summarized in the following chart:

EXPENSES	AMOUNTS
CourtCall to Attend Court Hearings	\$410.00
Media Release	\$3,146.90
Airfare/Train Fare	\$8,247.20
Lodging	\$1,992.50
Ground Transportation	\$1,748.53
Business Meals	\$375.06
Digital Advertising	\$12,417.40
Conference Calls	\$508.56
Total Expenses Requested:	\$28,846.15

25 19. Trident submits that all expenses incurred during the Application Period were
26 reasonable and necessary, are sought in compliance with the Guidelines, and should be allowed on
27 a final basis by the Court.

THE FEES AND EXPENSES REQUESTED
SHOULD BE AWARDED BASED UPON APPLICABLE LAW

20. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under Section 1103 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered [and] reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 331 of the Bankruptcy Code, which provides for interim compensation of professionals, incorporates the substantive standards of Section 330 to govern a court’s award of such compensation. 11 U.S.C. § 331.

21. Trident respectfully submits that the amounts Trident requests for compensation and expenses are fair and reasonable given the labor required and outcome achieved. The compensation Trident seeks in this Application is the customary compensation commonly sought by Trident in similar circumstances.

CONCLUSION

22. Trident believes that this Application appropriately sets forth the significant matters handled on behalf of the TCC and provides this Court, the UST, the Fee Examiner, the Debtors’ creditors, and other interested parties with an insightful overview of the scope of services rendered. Thus, Trident respectfully submits that the fees and expenses sought herein are reasonable and that the services rendered were necessary, effective, efficient, and economical.

Accordingly, Trident respectfully requests that this Application for allowance of fees and expenses, on a final basis, be granted in all respects.

WHEREFORE, Trident respectfully seeks entry of an order, substantially in the form as attached **Exhibit D**:

1. Awarding final allowance of compensation for professional services rendered during the Interim Application Period in the amount of **\$35,000.00**.


2. Awarding final allowance of compensation for professional services rendered during the Final Application Period in the amount of **\$441,346.15**, consisting of **\$412,500.00** in fees incurred and **\$28,846.15** in actual and necessary expenses.

1 3. Authorizing and directing the Reorganized Debtors to make prompt payment to
2 Trident in the total amount of **\$77,578.67**, which is the difference between the amount requested
3 and the amount already paid by the Debtors pursuant to the Interim Compensation Order and which
4 takes into account the \$500.00 agreed-upon fee adjustment to the First Interim Application of
5 Trident DMG LLC for Allowance and Payment of Compensation and Reimbursement of Expenses
6 for the Period From July 18, 2019 through September 30, 2019 [Dkt. No. 4721].

7 4. Granting such other and further relief as the Court may deem just and proper.
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9 Dated: August 26, 2020

TRIDENT DMG LLC

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11 By: 
12 Adam W. Goldberg
13 Partner
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CERTIFICATION

I, Adam W. Goldberg, declare as follows:

The following facts are personally known to me, and if called to do so, I could and would competently testify thereto.

1. I am a partner in the communications firm Trident DMG LLC (“**Trident**”). I submit this certification in support of the *Fourth Interim and Final Application of Trident DMG LLC for Allowance and Payment of Compensation and Reimbursement of Expenses for (1) the Interim Period From June 1, 2020 through June 30, 2020 and (2) the Final Period From July 18, 2019 through June 30, 2020* (the “**Application**”). Capitalized terms not defined herein have the meanings given in the Application.

2. I have personally reviewed the information contained in the Application and believe its contents to be true to the best of my knowledge, information and belief.

3. The compensation and expense reimbursement sought in this Application, to the best of my knowledge, information and belief, after reasonable inquiry, conforms with the Bankruptcy Code, the Local Rules, and the Guidelines.

4. The compensation and expense reimbursement requested in this Application are billed at flat fees in accordance with practices no less favorable than those customarily employed by Trident and generally accepted by Trident’s clients.

Date: August 26, 2020

TRIDENT DMG LLC

By: 

Adam W. Goldberg

Partner

Notice Parties

PG&E Corporation c/o Pacific Gas & Electric Company Attn: Janet Loduca, Esq. 77 Beale Street San Francisco, CA 94105	Keller & Benvenuti LLP Attn: Tobias S. Keller, Esq. Jane Kim, Esq. 650 California Street, Suite 1900 San Francisco, CA 94108
The Office of the United States Trustee for Region 17 Attn: James L. Snyder, Esq. Timothy Laffredi, Esq. 450 Golden Gate Avenue, 5th Floor, Suite #05-0153 San Francisco, CA 94102	Milbank LLP Attn: Dennis F. Dunne, Esq. Sam A. Khalil, Esq. 55 Hudson Yards New York, NY 10001-2163
Milbank LLP Attn: Paul S. Aronzon, Esq. Gregory A. Bray, Esq. Thomas R. Kreller, Esq. 2029 Century Park East, 33rd Floor Los Angeles, CA 90067	Weil, Gotshal & Manges LLP Attn: Stephen Karotkin, Esq. Jessica Liou, Esq. Matthew Goren, Esq. 767 Fifth Avenue New York, NY 10153-0119
Bruce A. Markell Fee Examiner 541 N. Fairbanks Court Suite 2200 Chicago, IL 60611-3710	Scott H. McNutt 324 Warren Road San Mateo, CA 94402